

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
NEW BERN DIVISION**

|  |   |                                |
|--|---|--------------------------------|
| <b>IN RE:</b>  | ) | <b>CASE NO. 15-02700-5-DMW</b> |
|  | ) |                                |
| <b>PEPPERTREE-ATLANTIC BEACH<br/>ASSOCIATION, INC.</b> | ) |                                |
|  | ) |                                |
| <b>DEBTOR</b>  | ) | <b>CHAPTER 11 PROCEEDING</b>   |

**BANKRUPTCY ADMINISTRATOR'S MOTION FOR PRODUCTION OF  
DOCUMENTS PURSUANT TO BANKRUPTCY RULE 2004**

**NOW COMES**, the Bankruptcy Administrator for the Eastern District of North Carolina, by and through her undersigned counsel, and respectfully moves this Court for an order upon the Debtor to produce certain documents pursuant to Bankruptcy Rule 2004. The Bankruptcy Administrator requests that the Debtor produce the documents that are indicated below:

- ☒ Board meeting minutes of the debtor for the forty-eight (48) months preceding the filing of the petition (May 12, 2011 through May 12, 2015).
- ☒ Detailed accounting of the Association's Dues and Expenses for the forty-eight (48) months preceding the filing of the petition (May 12, 2011 through May 12, 2015).
- ☒ Copies of bank statements and cancelled checks for all bank accounts held by the debtor within the forty-eight (48) months preceding the filing of the petition (May 12, 2011 through May 12, 2015).
- ☒ Detailed operating budget of the debtor for the forty-eight (48) months preceding the filing of the petition (May 12, 2011 through May 12, 2015).

The above documents requested for production are to be delivered by the 22<sup>nd</sup> day of June, 2015. The above documents requested are to be submitted to the following office:

- ☒ United States Bankruptcy Administrator  
150 Reade Circle  
Greenville, NC 27858  
(email: Scott\_Kirk@nceba.uscourts.gov)

**WHEREFORE**, the Bankruptcy Administrator requests that this Court issue an order upon the Debtor(s) to produce the above requested documents by **June 22, 2015**, and for such other and further relief the Court deems just an proper.

Dated this 8<sup>th</sup> day of June, 2015.

Respectfully submitted,

Marjorie K. Lynch  
Bankruptcy Administrator

By: /s/ C. Scott Kirk  
C. Scott Kirk  
Staff Attorney  
NC Bar No. 40349  
Bankruptcy Administrator's Office  
150 Reade Circle  
Greenville, NC 27858  
(252) 917-6156  
Scott\_Kirk@nceba.uscourts.gov

**CERTIFICATE OF SERVICE**

I, Amanda L. Gaster, of 150 Reade Circle, Greenville, North Carolina, 27858, certify:

That I am, and at all times hereinafter mentioned was more than eighteen (18) years of age;

That on the 8<sup>th</sup> day of June, 2015, I served copies of the foregoing document on the following:

Philip W. Paine  
Debtor's Attorney

By electronic service via cm/ecf, and,

**Peppertree-Atlantic Beach Association, Inc.**  
715 W Fort Macon Road  
Atlantic Beach, NC 28512

by depositing a copy thereof in an envelope bearing sufficient postage in the United States mail.

I certify under penalty of perjury that the foregoing is true and correct.

Dated this 8<sup>th</sup> day of June, 2015.

By: /s/ Amanda L. Gaster  
Amanda L. Gaster  
Paralegal  
150 Reade Circle  
Greenville, NC 27858